

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division
CASE NO.: 00-6273-CR-HUCK / GARBER

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CLERK
S.D. OF FLA - MIA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

ADAM TODD SILVERMAN,
Defendant.

DEFENDANT SILVERMAN'S MOTION TO ADOPT

Defendant, ADAM TODD SILVERMAN, through undersigned counsel, respectfully moves this Honorable Court to adopt, as if filed by him, the following Motions, and thus to preserve on his own behalf the benefit of whatever ruling may finally be made upon the issues raised by these filings, and to have each applied to him, wherever appropriate, as if filed in this own name:

1. Defendant Fred Massaro's Motion for Individual Voir Dire and incorporated Memorandum of Law (filed on behalf of Frederick Massaro);
2. Motion to Exclude 404(b) Evidence [403 and 404 Objections], and Incorporated Memorandum of Law (filed on behalf of Frederick Massaro);
3. Motion to Dismiss Indictment, RICO Conspiracy (filed on behalf of Frederick Massaro);

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4. Memorandum in Support of Motion to Dismiss (filed on behalf of Frederick Massaro);

5. Initial Motion o Dismiss Murder Related Counts (filed on behalf of Frederick Massaro);

6. Motion for Accelerated Disclosure of Brady, Jencks, Kyle, Agurs Related Material (filed on behalf of Frederick Massaro);

7. Motion to Suppress Evidence Derived from Illegal Electronic Surveillance in State Proceeding, Request for Evidentiary Hearing and Incorporated Memorandum of Law (filed on behalf of Frederick Massaro);

8. Request for Specific Brady Material and Memorandum of Law and for Immediate Disclosure; Potential Death Case (filed on behalf of Frederick Massaro);

9. Motion or Rule 104(c) Hearing Regarding Rule 404(b) Evidence with Memorandum of Law (filed on behalf of Frederick Massaro);

10. Motion o Strike Government's Discovery Response for Failure to Provide True and Accurate Copies of Intercepted Wire Communications and to Order Production of "Line Sheets" (filed on behalf of Ariel Hernandez);

11. Motion to Sever the Trial of all Co-Defendants or in the Alternative Motion in Limine to Preclude Introduction of Statements Made by Co-Defendants

after Ariel Hernandez was no longer a Member of the Conspiracy (filed on behalf of Ariel Hernandez);

12. Request to Disclose Expert Testimony (filed on behalf of Ariel Hernandez);

13. Request for Specific Brady Material and Memorandum of Law and for Immediate Disclosure (filed on behalf of Ariel Hernandez);

14. Motion to Sever Counts 17 and 18 and to Strike Allegations of the Murder of Jeannette Smith (filed on behalf of Ariel Hernandez);

15. Motion for Pre-Trial James Hearing and in the Alternative to Adhere to the Preferred Order of Proof and Memorandum or Law (filed on behalf of Ariel Hernandez);

16. Defendant's Motion for Discovery and Suppression of Co-Conspirator's Statements and Incorporated Memorandum of Law (filed on behalf of Ariel Hernandez);

17. Motion for Disclosure of Rule 404 Evidence and Memorandum of Law (filed on behalf of Ariel Hernandez);

18. Defendant, Julius Bruce Chiusano's Motion for Severance of Counts 17, 18, 19 and 20 (filed on behalf of Julius Bruce Chiusano); and

19. Memorandum or Law in Support of Defendant, Julius Bruce

Chiusano's Motion for Severance of Counts 17, 18, 19, and 20 (filed on behalf of Julius Bruce Chiusano).

In support thereof, Defendant states that the issues raised in the mentioned motion are applicable to the Defendant herein, and in the interest of convenience and to expedite the resolution of the issues in this cause, Defendant moves to adopt the above specified motions filed herein, as if filed and set forth on his own behalf.

Further, the Defendant understands that this Motion has application where the Defendant, ADAM TODD SILVERMAN, has standing to raise said motion.

WHEREFORE, based on the above and foregoing, the Defendant respectfully requests this Honorable Court to enter an Order granting this Motion to Adopt.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by mail on this 28th day of March, 2001, to the following:

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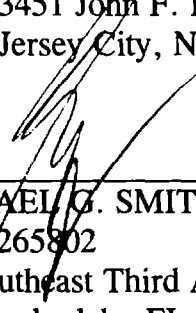
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